

**FELONY**

United States Courts

Southern District of Texas

FILED

December 07, 2022

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT**

for the

Southern District of Texas

United States of America  
v.  
Heriverto RAMIREZ

Case No. B-22-MJ-1140

*Defendant***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of December 6, 2022 in the county of Cameron in the Southern District of Texas, the defendant violated 21 U.S.C. § 841 (a) (1), an offense described as follows:

Knowingly and intentionally possess with the intent to distribute approximately 11.495 Kilograms of cocaine, a Scheduled II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment A

Continued on the attached sheet.

**ELI ROCHA JR.**

Digitally signed by ELI ROCHA JR  
Date: 2022.12.06 21:34:36 -06'00'

*Complainant's signature*

Eli Rocha, Special Agent  
Homeland Security Investigations

*Printed name and title*

Submitted by reliable electronic means, sworn to, and signature attested to telephonically pursuant to Fed.R.Crim.4.1 on December 7, 2022.

Date: December 7, 2022

*Ronald G. Morgan*  
Ronald G. Morgan, U.S. Magistrate Judge

*Printed name and title*

City and state: Brownsville, Texas

Attachment A

B-22-MJ-1140

On Tuesday, December 6, 2022, HSI special agents (SAs), along with the Texas Department of Public Safety Criminal Investigations Division (DPS CID), were conducting surveillance at Heriverto RAMIREZ's residence located at [REDACTED] in Brownsville, TX. HSI SAs observed RAMIREZ exit the residence carrying a brown box and place it inside a red Chevrolet Silverado parked in the driveway of the residence. The vehicle departed the residence and was followed by HSI SAs and DPS CID.

During surveillance, a Cameron County Sheriff's Office (CCSO) Deputy conducted a traffic stop on the red Chevrolet Silverado bearing Texas license plate [REDACTED]. Deputies made contact with the driver who was identified as Heriverto RAMIREZ ([REDACTED] 1987).

Deputies obtained verbal consent from RAMIREZ to search his vehicle. Deputies located a brown box in the rear passenger side of the vehicle which was labeled for shipping. A CCSO K-9 was utilized to conduct a free air sniff of the box in which he alerted to the presence of narcotics.

RAMIREZ granted consent to search the box which contained a tankless water heater. Additional search of the water heater revealed a vacuum sealed package containing a white powdery substance which field tested positive for properties of cocaine. The cocaine had a weight of 495 grams. The package was secured, and both the package and RAMIREZ were transported to the CCSO in Olmito, TX.

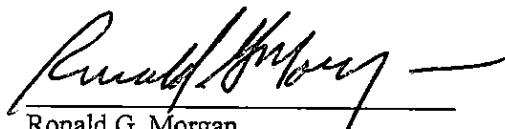
A Texas DPS SA applied for and was granted a search warrant for RAMIREZ's residence located at [REDACTED] in Brownsville, TX. During the search, DPS SAs removed the bottom drawers of a dresser located in a bedroom and discovered 11 brick like packages containing a white powdery substance which field tested positive for properties of cocaine. The total weight of cocaine in the 11 packages was 11 kilograms.

A total of 11.495 kilograms of cocaine were seized from RAMIREZ.

ELI ROCHA Digital signature by ELI  
ROCHA JR  
Date: 2022.12.06  
21:35:09 -06'00'

Eli Rocha Jr., Special Agent  
Homeland Security Investigations

Submitted by reliable electronic means, sworn to, and signature attested to telephonically pursuant to Fed.R.Crim 4.1 on December 7, 2022.

  
Ronald G. Morgan  
United States Magistrate Judge